

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE**

IN RE:

WORTHINGTON, ROBERT F., JR.

Case No. 09-33082

Chapter 7

Debtor.

**NOTICE OF SALE**

**NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING**

Pursuant to Local Rule 9013-1(h), the court may consider this matter without further notice or hearing unless a party in interest files an objection. If you object to the relief requested in this paper, you must file with the clerk of the court at the Howard H. Baker, Jr. U. S. Courthouse, 800 Market Street, Suite 330, Knoxville, TN 37902, an objection within twenty-one (21) days from the date this paper was filed and serve a copy on the movant's attorney, Dean B. Farmer, P. O. Box 869, Knoxville, TN 37901-0869. If you file and serve an objection within the time permitted, the court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the court will consider that you do not oppose the granting of the relief requested in this paper and may grant the relief requested without further notice or hearing.

Dean B. Farmer, Trustee, pursuant to Bankruptcy Rules 2002(a) and 6004(a) and §363(b) of the Bankruptcy Code gives notice of the proposed sale of the estate's interest in the following property:

1. The debtor, Robert F. Worthington, Jr., filed for protection under Chapter 7 of the Bankruptcy Code on June 4, 2009 and Dean B. Farmer was appointed Trustee.
2. The Debtor listed a 1/3 ownership interest in Quarry Bank, LLC on his Schedule B – Personal Property.
3. The Trustee desires to sell the Estate's interest in Quarry Bank, LLC to Michael Kinnard and Michael Farry, who hold interest in Quarry Bank, LLC. Quarry Bank, LLC only owns certain contract rights for a potential development, which it has never paid, and has indebtedness in the approximate amount of \$362,833.56, plus interest. Under the terms of the

sale, the interest will be conveyed with the agreement that upon the sale of Quarry Bank, LLC in the amount \$550,000.00, the Estate's potential interest of \$183,333.33 will be escrowed with the determination to be made as to whether any portion of that should be applied to debts of creditors of Quarry Bank, LLC. The Estate will be held harmless from any liability of the indebtedness in the approximate amount of \$362,833.56.

WHEREFORE, the Trustee gives notice of the Trustee's intent to sell the estate's interest in Quarry Bank, LLC as listed above to Michael Kinnard and Michael Farry. Any objection must be filed pursuant to Rule 6004(b).

Respectfully submitted this 5th day of August, 2010.

**HODGES, DOUGHTY & CARSON, PLLC**

/s/ Dean B. Farmer  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on August 5th, 2010, a copy of the foregoing *Notice of Sale* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties on the attached mailing matrix will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/DEAN B. FARMER (BPR# 006851)

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